The Honorable John C. Coughenour 1 2 3 4 5 6 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 7 AT SEATTLE 8 YUNNAN DUOBANG NETWORK TECHNOLOGY CO LTD, 9 No. 2:23-cv-01137-JCC Plaintiff, 10 STIPULATED MOTION AND [PROPOSED] ORDER AMENDING v. 11 BRIEFING SCHEDULE FOR AMAZON.COM SERVICES LLC, MOTION TO VACATE 12 ARBITRATION AWARD AND **CROSS-MOTION TO CONFIRM** Defendant. 13 ARBITRATION AWARD 14 Noting Date: October 16, 2023 15 **STIPULATED MOTION** 16 Plaintiff Yunnan Duobang Network Technology Co., Ltd. ("Plaintiff") and defendant 17 Amazon.com Services LLC ("Defendant") jointly move the Court to enter the subjoined order amending the briefing schedule for Plaintiff's motion to confirm the arbitration award at issue and 18 Defendant's cross-motion to confirm that same arbitration award. In support of this Stipulated 19 Motion, the parties state the following: 20 1. Plaintiff filed its Complaint to Vacate Arbitration on July 31, 2023, commencing this 21 action under Section 10 of the Federal Arbitration Act ("FAA"), 9 U.S.C. § 1, et. seq., to vacate a 22 final arbitration award entered in an arbitration proceeding between the parties Dkt. 1. 23 2. On September 27, 2023, the Court entered its Order granting the parties Stipulated 24 Motion Setting Briefing Schedule for Motion to Vacate Arbitration Award & Cross-Motion to STIPULATION AND [PROPOSED] ORDER Davis Wright Tremaine LLP AMENDING BRIEFING SCHEDULE (2:23-cv-01137-JCC) - 1 LAW OFFICES 920 Fifth Avenue, Suite 3300 4868-5954-4199v.1 0051461-005908 Seattle, WA 98104-1610

206.622.3150

Event	Due Date
Plaintiff's motion to vacate arbitration	October 9, 2023
award	
Defendant's opposition to Plaintiff's	October 23, 2023
motion and Defendant's cross-motion to	
confirm arbitration award	
Plaintiff's opposition to Defendant's	November 6, 2023
cross-motion and reply in support of	
Plaintiff's motion	
Defendant's reply in support of cross-	November 20, 2023
motion	
Noting Date for motion and cross-	November 24, 2023
motion	

3. October 9, 2023, was a federal holiday (i.e., Columbus Day/Indigenous Peoples' Day). Plaintiff therefore filed its Motion to Vacate Arbitration Award on October 10, 2023 (to which Defendant does not object).

4. Since that date, Defendant's counsel has encountered scheduling complications and conferred with Plaintiff's counsel regarding the same. As a professional accommodation to Defendant's counsel, Plaintiff's counsel therefore stipulates to the parties' joint request for a modest amendment of the parties' remaining briefing scheduling to accommodate Defendant's counsel:

Event	Due Date
Defendant's opposition to Plaintiff's	Prior: October 23, 2023
motion and Defendant's cross-motion to	Amended: October 30, 2023
confirm arbitration award	
Plaintiff's opposition to Defendant's	Prior November 6, 2023
cross-motion and reply in support of	Amended: November 13, 2023
Plaintiff's motion	
Defendant's reply in support of cross-	[Unchanged] November 20, 2023
motion	
Noting Date for motion and cross-	[Unchanged] November 24, 2023
motion	

7. For the foregoing reasons, the parties jointly respectfully request that the Court enter an order setting forth the following amended briefing schedule for their respective motions:

1	STIPULATED this 16 <sup>th</sup> day of October, 2023.	
2	MANN LAW GROUP PLLC & AU LLC Attorneys for Plaintiff Yunnan Duobang	DAVIS WRIGHT TREMAINE LLP Attorneys for Defendant Amazon.com
3	Network Technology Co., Ltd.	Services LLC
4	By /s/ Philip P. Mann Philip P. Mann, WSBA #28860	By <u>/s/ Arthur Simpson</u> John Goldmark, WSBA #40980
5	403 Madison Avenue North, Suite 240 Bainbridge Island, WA 98110 Telephone: 206.436.0900	Arthur Simpson, WSBA #44479 Jean M. Fundakowski ( <i>pro hace vice</i> ) Mark Burnside ( <i>pro hac vice</i> )
6	Email: phil@mannlawgroup.com	920 Fifth Avenue, Suite 3300 Seattle, WA 98104-1610
7	Adam E. Urbancyzyk, (pro hac vice) 444 West Lake Street, Suite 1700 Chicago, IL 60606	Telephone: 206.622.3150 Email: johngoldmark@dwt.com Email: arthursimpson@dwt.com
8	Telephone: 312.715.7312 Email: adamu@au-llc.com	Email: <u>jeanfundakowski@dwt.com</u> Email: <u>markburnside@dwt.com</u>
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## [PROPOSED] ORDER

The parties jointly moved the Court for an amended briefing schedule for Plaintiff's

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DAVIS WRIGHT TREMAINE LLP

Attorneys for Defendant Amazon.com Services LLC

19 By /s/ Arthur Simps on

**Presented by:** 

John Goldmark, WSBA #40980 Arthur Simpson, WSBA #44479 Jean M. Fundakowski (pro hace vice)

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STIPULATION AND [PROPOSED] ORDER AMENDING BRIEFING SCHEDULE (2:23-ev-01137-JCC) - 4

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## motion to vacate the arbitration award and Defendant's cross-motion to confirm the arbitration

award. The remaining briefing deadlines are hereby reset for the following dates:

Event	Due Date
Defendant's opposition to Plaintiff's	October 30, 2023
motion and Defendant's cross-motion to	
confirm arbitration award	
Plaintiff's opposition to Defendant's	November 13, 2023
cross-motion and reply in support of	
Plaintiff's motion	
Defendant's reply in support of cross-	November 20, 2023
motion	
Noting Date for motion and cross-	November 24, 2023
motion	

IT IS SO ORDERED.

Dated this 17th day of October, 2023.

John C. Coughenour

UNITED STATES DISTRICT JUDGE

1	Stipulated / Approved as to Form:
2	MANN LAW GROUP PLLC & AU LLC Attorneys for Plaintiff Yunnan Duobang Network Technology Co., Ltd.
3	By /s/Philip P. Mann
4	Philip P. Mann, WSBA #28860 403 Madison Avenue North, Suite 240
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